



Policy: Interim COVID-19 Policy	Policy Number: I-6.17
Policy Owner(s): Human Resources	Original Date: May 13, 2020
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I. **POLICY:** John Carroll University (“the University”) is committed to the health and safety of all members of its community, consistent with its mission of caring and respecting each person. The University also is committed to complying with all public health orders and guidance, and seeks to adopt best practices for the prevention and response to COVID-19. In light of the COVID-19 pandemic, the University adopts this interim policy to set out requirements and procedures to comply with any applicable federal, state and local public health directives or guidance and to establish best practices to help protect the health and safety of its community members.

All employees are obligated to comply with all requirements and procedures outlined in this policy and with other health and safety directives or notices issued by the University related to the COVID-19 pandemic. Employees who do not comply with this policy and procedures will be subject to warnings and/or appropriate corrective action for continuing violations.

As our knowledge of COVID-19 evolves and new directives and guidance are issued, this policy will be updated periodically based on new directives or guidance from public health officials and/or health and safety best practices adopted by the University. The University will provide electronic notice to employees with updates to University requirements or protocols, whether those requirements are stated in separate communications to employees or stated via this policy. The updated policy will become effective upon the posting of the revised policy.

II. **PURPOSE:** To outline health and safety requirements and procedures for employees, contractors, and visitors related to the COVID-19 pandemic

III. **SCOPE:** All employees, contractors, volunteers, and visitors to John Carroll University’s campus, as well as volunteers and AmeriCorps service members to the extent applicable to such individuals. Some provisions of this policy may not apply to visitors or contractors of the University, as specified in the policy. Cooperating teachers who are

employed by school districts, or other organizations or entities and supervise JCU students in an off-campus educational internship setting are not subject to this policy. Human Resources may determine that other individuals acting in a capacity not on JCU's campus or who do not interact with the campus community may not be subject to this policy.

IV. DEFINITIONS:

Booster: Additional dose of COVID-19 vaccine, of any type, recommended by the Centers for Disease Control (CDC), which have been found to be important to periodically “boost” the individual’s immune system. See CDC guidance on boosters: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/booster-shot.html>

Fully Vaccinated: In general, an individual is considered Fully Vaccinated they have received all doses in the primary series of vaccinations, which include:

- 2 weeks after their second dose in a 2-dose series, such as the Pfizer or Moderna vaccines, or
 - 2 weeks after a single-dose vaccine, such as Johnson & Johnson’s Janssen vaccine
- See https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html?s_cid=11747:cdc%20fully%20vaccinated%20definition:sem.ga:p:RG:GM:gen:PTN:FY22

Face Mask or Face Covering: A face [Mask or Face Covering](#) that covers the individual’s nose and mouth. (See CDC guidance on masks: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/about-face-coverings.html>)

Up-to-Date on Vaccinations: An individual is up-to-date on vaccinations if they have received all doses in the primary series and all booster dose(s) recommended for you, when eligible.

Vaccine recommendations are different depending on your age, the vaccine you first received, and time since last dose. See the CDC website for information on vaccination recommendations.

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html>

V. PROCEDURES:

- A. All employees, contractors and visitors are expected to comply with this policy and all requirements of the University related to health and safety procedures to prevent the spread of COVID-19 and respond to cases of

COVID-19 on campus. The University and all employees are obligated to comply with all orders and directives of federal, state and local health authorities related to COVID-19, as well as with the requirements of the University and as outlined in this policy.

- B.** Employees are expected to conduct their work on campus, unless their supervisor and Human Resources has approved a telecommuting work arrangement under the University's Telecommuting Policy, or has approved a work accommodation under the Reasonable Accommodation Policy permitting them to work from home.
- C.** For employees, contractors, volunteers, and visitors, a [Mask or Face Covering is optional](#) indoors and outdoors while on University property. Supervisors and other employees should respect the preference of those on campus who choose to wear a [Mask or Face Covering](#) while on campus and should not disclose to others confidential information regarding the individual's reason for choosing to wear a Mask or Face Covering.
- D.** Based on federal, state and local guidance, current conditions on campus or in the local community, or other University health and safety determinations, the University may alter the requirements for Masks or Face Coverings, physical distancing, or other health and safety protocols at any time. Employees and other members of the campus community will be notified in writing about changes to the University COVID protocols by Human Resources, the COVID Task Force, or another appropriate office.
- E.** Employees are required to provide documentation to Human Resources to confirm that they are [Fully Vaccinated. Employee also will be asked for information as to](#) whether they have received any [Booster dose\(s\)](#).
- F.** Consistent with federal guidance from health officials, the University requires all John Carroll University students, faculty, and staff (as well as volunteers and AmeriCorps service members) to be [Fully Vaccinated](#) and to present proof of full vaccination. New employees will be asked to present proof of full vaccination upon hire. Employees, volunteers, and AmeriCorps service members must comply with the stated process for producing a copy of their vaccination card. Only if the individual is unable to produce their vaccination card (i.e. card is lost etc), may the University permit an employee to submit an attestation of vaccination. Such attestation must meet the requirements set by the University. In such an instance, employees and volunteers are to use the COVID-19 Vaccination Attestation provided by Human Resources to report their vaccination status. Vaccination status and documentation will be maintained in a private and secure manner by Human Resources, consistent with applicable law. Employees and volunteers who do not cooperate with the

vaccination requirement may be subject to appropriate and necessary health and safety measures (including but not limited to weekly testing, possible restrictions on use of certain facilities, and other measures), as well as other appropriate actions or corrective actions consistent with the University's policies applicable to employees. Individuals should contact Human Resources for questions regarding the vaccination requirement. Should federal or state health authorities alter the requirements to be considered Fully Vaccinated or the University determines such action is needed, the University may alter its vaccination requirement. Employees, volunteers and service members will be notified by Human Resources or another appropriate University official should this be required.

- G.** Individuals may seek medical and non-medical exemptions from Vaccination Requirements. Vaccination exemption forms (available [here](#)) must be completed by the date identified by the COVID-19 Task Force.. Non-medical exemption requests may be based on sincerely held religious beliefs, moral or ethical beliefs, special personal circumstances, or other such basis determined to be permitted by the University. Medical exemption requests from employees and volunteers will be reviewed by Human Resources, in consultation with the JCU Health Center, as part of an interactive accommodation process. Non-medical exemption requests will be reviewed by Human Resources as part of an interactive process, in consultation as needed with a Non-Medical Exemption Committee consisting of representatives from Human Resources, Mission & Identity, and the Diversity, Equity and Inclusion Office. If a request for an exemption is granted, the employee or volunteer may be required to comply with other health and safety measures determined by the University to be necessary and appropriate,, or other measures to protect the health and safety of the campus community. The University reserves the right to amend or alter the exemption process or exemption categories, based on federal, state or local directives, or University health and safety determinations.
- H.** Supervisors and employees should not inquire whether another employee is [Fully Vaccinated](#) or has received a [Booster](#). Human Resources is permitted to ask about vaccination status of any employee, and will maintain vaccination records in a manner consistent with federal and state requirements and University practices. Supervisors and employees should consult with Human Resources regarding concerns about the vaccination status of any employee.
- I.** Contractors and visitors are expected to comply with this policy and its requirements related to COVID-19, including but not limited to recommendations related to hygiene measures and reporting cases, except to the extent these provisions are applicable only to employees.
- J.** Visitors and AmeriCorps service members to the University campus are expected to follow the provisions of this policy related to COVID-19,

including but not limited to recommendations related to hygiene measures and reporting cases, except to the extent these provisions are applicable only to employees. AmeriCorps service members also are required to comply with the vaccination requirement.

All departments who invite visitors to campus in advance should notify the visitors ahead of their arrival of any applicable COVID requirements in effect at the time of the visit.

K. Physical or Social Distancing:

Consistent with current federal guidance, physical distancing is not required inside any buildings or outside on campus while on University property.

Depending on the current prevalence of COVID-19 on campus or in the local community and determinations based on appropriate health and safety measures at the time, the COVID-19 Task Force or University leadership reserves the right to implement requirements to maintain additional physical or social distancing from others while on campus, whether inside buildings or outside on campus property.

Per CDC guidance, for those seeking ways to protect themselves from COVID-19 and desire greater disease prevention, it is recommended by the CDC that individuals increase space and distance from others to avoid possible exposure. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html#space>

1. The University cannot guarantee that it will be able to adjust workspaces, desks or workstations to accommodate physical distancing needs of those who desire to increase distance and space from others, , unless the employee has an accommodation plan under the Reasonable Accommodation Policy that includes physical distancing as an accommodation.
2. A supervisor or department chair can contact the Facilities Department or Risk Management for guidance on requests for office furniture redesign, the installation of temporary barriers, or other preventative measures, which may be provided when possible.
3. When in place, all employees must comply with floor markings (i.e. tape or other visual cues to indicate physical distances) and posted signs regarding physical distancing and other preventative protocols.

L. Symptom Assessment:

Employees, visitors and contractors are asked to monitor themselves for symptoms of COVID-19.

1. All employees, visitors and contractors should be aware of the symptoms of COVID-19, which include: 1) fever or chills, 2) cough, 3) shortness of breath or difficulty breathing, 5) fatigue, 6) muscle or body aches, 7) new headache, 8) new loss of taste or smell, 9) sore throat, 10) congestion or runny nose (other than related to seasonal allergies), 11) nausea or vomiting, and/or 11) diarrhea.
2. If an employee, visitor or contractor has tested positive or been diagnosed with COVID-19, or has symptoms of COVID-19 and suspects they have COVID-19 but do not yet have test results, the employee, visitor or contractor may not come to campus and should notify their supervisor and Human Resources (or host department) right away. Employees who have symptoms but are well enough to work AND who 1) have not tested or been diagnosed with COVID-19 and/or 2) do not suspect they have COVID and do not have a pending COVID test may come to campus, but are advised to wear a mask as a general preventative measure to reduce the spread of germs. Human Resources will follow federal and state guidance in advising employees, volunteers or supervisors about appropriate and necessary isolation, and also may consult with the JCU Health Center, as necessary.
3. Employees who come to campus when they have tested positive or have been diagnosed with COVID-19 or who have symptoms of COVID-19 and suspect they have COVID-19 but do not yet have test results will be asked to leave campus immediately.
4. Isolation for COVID Positive Employees: Employees who have tested positive for or been diagnosed with COVID-19 regardless of vaccination status or symptoms may not return to campus until all of the following have occurred: 1) 5 days have passed since symptoms began, AND 2) the symptoms are resolving or are getting better, AND 3) 24 hours have passed since the cessation of fever without use of any fever-reducing medication. If these three (3) items are met, the employee may return to campus and continue to wear a mask at all times for five (5) additional days.

Employees who have tested positive for or been diagnosed with COVID-19 and whose symptoms are not improving or continue to have a fever after the initial 5 days may not return to campus for five (5) additional days and then only if the individual does not have a fever and symptoms are resolving.

5. If the employee had moderate illness (i.e. experienced shortness of breath or difficulty breathing) or severe illness (i.e. hospitalized) due to COVID-19 or the employee has a weakened immune system, the employee must isolate through day 10. If the employee had severe illness or has a weakened immune system, CDC recommends that the employee consult with their health care provider before ending isolation, and the employee may require a test prior to ending isolation.
6. If an employee continues to exhibit any symptoms of COVID-19 but wishes to return to work (i.e. cough etc.), the employee may be asked to produce a negative COVID-19 test and/or provide clearance from a health care provider before returning to work.
7. Masking Requirement for Employees who Have Been Exposed: Per CDC guidance, employees who have been in close contact with an individual who has been diagnosed with or tested positive for COVID-19 are not required to quarantine, but must wear a Mask or Face Covering when around others for ten (10) days following the last exposure. Such employees should test on day 5, if possible. If such employees develop symptoms or test positive, they should isolate away from campus, as outlined above.
8. Per CDC guidance, screening testing of asymptomatic employees, students, or others is not recommended in most community settings.
9. Current requirements for isolation are available at https://www.cdc.gov/coronavirus/2019-ncov/your-health/isolation.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fyour-health%2Fquarantine-isolation.html. The University will issue updated isolation requirements as those are updated by federal or state health authorities.
9. Employees, contractors and visitors must cooperate with the University and with public health officials in providing information related to any positive or suspected cases of COVID-19, including as needed for identification of exposed individuals, and other health or safety concerns.

M. Masks or Face Coverings:

For employees, contractors, volunteers, and visitors, a [Mask or Face Covering is optional](#) indoors and outdoors while on University property. Supervisors and other employees should respect the preference of those on campus who choose to wear a [Mask or Face Covering](#) while on campus and should not disclose to others confidential information regarding the individual's reason for choosing to wear a Mask or Face Covering.

1. If an employee desires to wear a Mask or Face Covering to wear at work, the University will make available a Mask or Face Covering, when possible. Masks or Face Coverings can be picked up from a location designated by Risk Management and Facilities. Disposable masks should be placed in the trash when use is finished.

CDC continues to indicate that the wearing of a Mask or Face Covering is an important public health measure to reduce the spread of COVID-19 and other infectious diseases when an employee or other individual has been exposed to COVID-19 or is returning from an isolation period after testing positive for COVID-19.

N. Hygiene Measures:

1. Per CDC guidance, it is recommended that employees, contractors and visitors engage in proper disease prevention hygiene measures, including frequent hand washing with soap and water (for at least 20 seconds), hand sanitizing, covering your cough with a tissue or elbow, and other additional hygiene protocols as recommended by the University and federal, state and local public health officials. Employees should avoid touching their eyes, nose or mouth.
 2. Departments should disinfect common work areas and common spaces, as appropriate.
 3. Dependent upon current COVID-19 prevalence on campus and in the local community, employees may be advised to minimize sharing of office food, work materials and office supplies, as appropriate.
- O. Dependent upon current COVID-19 prevalence on campus and in the local community, efforts should be made to enable natural workplace ventilation when possible.

P. Meetings or Gatherings:

1. The University will comply with all directives, if any, of the State of Ohio and other public health officials related to meetings and gatherings.
2. As appropriate and authorized, meeting organizers may continue to utilize Zoom or other virtual platforms for group meetings, especially when employees are approved for a telecommuting or work accommodation that permits them to work from home.
3. The University reserves the right to limit the number of employees or visitors present in any location on campus or at any University-sponsored event, if needed for public health purposes and to comply with federal, state or local directives.

Q. Department Plans:

Individual department supervisors and department chairs should develop area plans for their employees to follow in their department that are consistent with this policy. These plans may address specific issues and needs in the particular work area related to prevention and protection of employees, students, and visitors. These plans will be dependent upon the services that the department is asked to provide. Supervisors and department chairs should consult with Risk Management or Human Resources regarding questions regarding departmental plans.

R. Reporting Cases

1. An employee must notify immediately Human Resources if the employee has tested positive or been diagnosed with COVID-19 and has been on campus from 2 days prior to the onset of symptoms (or 2 days prior to the positive test result for asymptomatic individuals) to the time of individual's isolation.
 - a. The dates when the employee was on campus, must be disclosed to Human Resources. Human Resources may request additional information if situations warrant to maintain the health and safety of the campus
 - b. Human Resources will advise the individual on isolation guidance consistent with federal and state public health guidance.
2. All employees must cooperate with the University and any local public health officials in determining appropriate steps for limiting and tracking potential exposure to others while on campus.
3. Any concerns related to COVID-19 cases or risk issues should be directed to the COVID-19 Task Force or the Office of Risk

Management.

S. Accommodation Process

Employees who seek a workplace accommodation related to COVID-19 should contact Human Resources to request an accommodation and engage in the accommodation process under the University's Reasonable Accommodation Policy.

T. Enforcement:

Employees who fail to comply with this policy or other health and safety directives of the University or public health officials related to COVID-19 will be subject to warning or other appropriate corrective action.

VI. CROSS REFERENCE:

U.S. Centers for Disease Control - Stay up-to-date with Vaccines:
https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html?s_cid=11747:cdc%20fully%20vaccinated%20definition:sem.ga.p:RG:GM:gen:PTN:FY22

U.S. Centers for Disease Control – Boosters:
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/booster-shot.html>

U.S. Centers for Disease Control – Release re: New Guidance:
<https://www.cdc.gov/media/releases/2022/p0811-covid-guidance.html>

U.S. Centers for Disease Control – Protecting Yourself and Others:
<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html#space>